

FILED
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CLERK, US DISTRICT COURT
NO. DIST. OF CA.

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

VC

UNITED STATES OF AMERICA,

Plaintiff,

v.

DMITRY DOKUCHAEV,
IGOR SUSHCHIN,
ALEXSEY BELAN,
KARIM BARATOV,

Defendants.

Case No. CR

CR17

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GOVERNMENT'S EX PARTE MOTION TO SEAL
AND [PROPOSED] ORDER

FILED UNDER SEAL

The United States moves to seal the Indictment returned by the grand jury in the above-captioned action on February 28, 2017. The defendants are not aware of the Indictment and have not been apprehended. Public notice of the Indictment would likely cause them to attempt to avoid apprehension, destroy evidence, and tamper with witnesses. The government believes that each of the defendants currently resides and is located outside the United States.

The United States requests permission of the Court to provide notice to the victims of the offenses charged in the Indictment (Yahoo and Google), and allow the United States Attorney's Office and the Department of Justice to transmit the Indictment and arrest warrants to representatives from the Department of State, other U.S. federal agencies, and to foreign authorities for purposes of effectuating provisional arrest warrants, requests made under Mutual Legal Assistance Treaties, extradition requests

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1 and coordinating federal government and law enforcement activity prior to unsealing of the Indictment.

2 DATED: February 27, 2017

Respectfully submitted,

3 BRIAN J. STRETCH
4 United States Attorney

5 JOHN H. HEMANN
6 Assistant United States Attorney

7 **[PROPOSED] ORDER**

8 The Indictment, arrest warrants, and this application and order are hereby SEALED.

9 Counsel for the United States may provide notice to the victims of the offenses charged in the
10 Indictment (Yahoo and Google), and may transmit the Indictment and arrest warrants to representatives
11 of the Department of State, other U.S. federal agencies, and foreign authorities for purposes of
12 effectuating provisional arrest warrants, requests made under Mutual Legal Assistance Treaties, and
13 extradition requests, and coordinating federal government and law enforcement activity prior to public
14 unsealing of the Indictment.

15 IT IS SO ORDERED.

16 Dated: 2/28/2017

17 
18 LAUREL BEELER
19 United States Magistrate Judge